

Exhibit C-2

THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

In re: PHARMACEUTICAL) MDL NO. 1456
INDUSTRY AVERAGE WHOLESALE) CIVIL ACTION
PRICE LITIGATION) 01-CV-12257-PBS

Volume II

Continued Videotaped Rule 30(b)(6)
Deposition of MICHAEL SELLERS, at
77 West Wacker Drive, Chicago,
Illinois, commencing at 9:00 a.m.
On Monday, March 31, 2008, before
Donna M. Kazaitis, RPR, CSR
No. 084-003145.

1 BY MS. ST. PETER-GRIFFITH:

2 Q. We talked earlier at your first day of
3 deposition about communications that Abbott had
4 with state or federal Medicare and Medicaid
5 officials about its pricing. And you testified
6 that Abbott did not have any communications with
7 state or federal Medicare or Medicaid officials
8 about questions concerning how Medicare or
9 Medicaid reimbursement worked, is that fair, other
10 than the individual questions raised by the
11 reimbursement staff?

12 MS. TABACCHI: Object to the form,
13 beyond the scope of the Notice.

14 THE WITNESS: I believe that's the case.
15 BY MS. ST. PETER-GRIFFITH:

16 Q. Is there any other communication that
17 Abbott is aware of that it had with Medicare or
18 Medicaid officials concerning pricing of the
19 subject drugs or AWP related issues associated
20 with the subject drugs?

21 MS. TABACCHI: Objection, beyond the
22 scope, object to the form.

1 THE WITNESS: Other than the required
2 communication for the State of Texas, I'm not
3 aware of any communications with regard to price
4 or AWP.

5 BY MS. ST. PETER-GRIFFITH:

6 Q. What information is Abbott aware of that
7 provides the basis for its statement that it never
8 provided false or misleading information to any
9 state or federal Medicare or Medicaid official?

10 MS. TABACCHI: Object to the form,
11 beyond the scope of the Notice.

12 Can you refer me to what topic do
13 you think it falls within?

14 MS. ST. PETER-GRIFFITH: Sure. It falls
15 within Topic 12, Items 1, 2, or 3.

16 MS. TABACCHI: It's my understanding
17 that those topics were withdrawn.

18 MS. ST. PETER-GRIFFITH: That they were
19 withdrawn?

20 MS. TABACCHI: Yes, based on the
21 communications and the correspondence back and
22 forth with you, I believe, on these topics that

1 back as requested.)

2 MS. TABACCHI: I would object to that as
3 beyond the scope.

4 MS. ST. PETER-GRIFFITH: Sub 3, Topic
5 12.

6 MS. TABACCHI: It's my understanding
7 that that was withdrawn. But we don't need to
8 spend more time today debating that. I will
9 object as beyond the scope.

10 BY MS. ST. PETER-GRIFFITH:

11 Q. Sir, if you can answer the question.

12 A. It's not something that I'm prepared to
13 talk about.

14 Q. Are there any other communications that
15 you're aware of with any state or federal Medicaid
16 or Medicare official concerning Abbott's pricing
17 its list prices or its AWP's?

18 MS. TABACCHI: I assume you're
19 incorporating his first day of testimony?

20 MS. ST. PETER-GRIFFITH: Yes, I am. I'm
21 just trying to round out this topic.

22 MS. TABACCHI: Sure. I understand.

1 THE WITNESS: There were a number of
2 prices that were communicated to federal in terms
3 of AMP and in terms of 340(b) prices, in terms of
4 Federal Supply Schedule prices, and so on and so
5 forth. But as far as list and AWP, no.

6 BY MS. ST. PETER-GRIFFITH:

7 Q. For the period from 1991 through 2004,
8 what were the revenues for the Hospital Products
9 Division?

10 MS. TABACCHI: We're switching topics
11 now?

12 MS. ST. PETER-GRIFFITH: Yes.

13 MS. TABACCHI: I'm going to object to
14 the form.

15 THE WITNESS: I don't have those numbers
16 at my fingertips here.

17 BY MS. ST. PETER-GRIFFITH:

18 Q. Can you give me any sense as to the
19 overall financial performance of Abbott's Hospital
20 Products Division from 1991 until the time of the
21 Hospira spin?

22 MS. TABACCHI: Object to the form. For